

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

CYNTHIA LEE,)
)
 Plaintiff,)
 v.) **Civil Action No. 14-cv-1116 (AJT/TCB)**
)
 FAIRFAX COUNTY SCHOOL BOARD, et al.,)
)
 Defendants.)

EXHIBIT LIST

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT
AND MATERIAL STATEMENT OF FACTS NOT IN DISPUTE

<u>Exhibit No.</u>	<u>Description</u>
1	2012 Settlement Agreement
2	Affidavit of Jamey Chianetta
3	Lee Halley memos, 2008-2012 re Lee performance concerns, remediation efforts, and 2011-12 observations and evaluations (including P. Exhs. N, Q, S, T, V, W, X, Z, AA, FF, GG, and JJ)
4	FCPS <i>Performance Assessment and Evaluation Handbook</i> (P. Exh. B)
5	FCPS Regulation 4440.12, <i>Duties, Responsibilities, and Rights of Employees – Performance Assessments and Evaluations</i>
6	Affidavit of Robert Callahan
7	Statement of Grievance – 02/10/2012
8	8 VAC 20, <i>et seq.</i> , (“State Grievance Procedure for Teachers”)
9	FCPS Regulation 4461.1, <i>Duties, Responsibilities, and Rights of Employees – Procedure for Adjusting Grievances-Contracted/Licensed Professional Personnel</i> (Part II Grievance Procedure)
10	Callahan/Lee email thread of 02/14/2012
11	Chianetta Recommendation for Dismissal (P. Exh. KK)
12	Lee request to incorporate dismissal into Grievance (P. Exh. OO)
13	FCPS Regulation 4294.4, <i>Employee Actions and Records – Procedures for Non-Renewal and Dismissal-Educational Personnel</i> , and Regulation 4293.6, <i>Employee Actions and/or Records – Dismissal-Definition of Just Cause</i>
14	Lee/Callahan email thread of 05/17/2012 – 05/18/2012
15	Dr. Phyllis Pajardo letter of 05/23/2012 recommending dismissal (P. Exh. LL)
16	Jack Dale letter of 05/30/2012 re Notice Recommending Dismissal (P. Exh. MM)
17	Lee/Callahan email thread of 06/03/2012
18	Lee Request for Fact-Finding Panel and Callahan/Lee email thread
19	Affidavit of Carol Marchant

<u>Exhibit No.</u>	<u>Description</u>
20	Faughnan, Mendicino letter of representation of 06/18/2012
21	Murphy letter of 06/25/2012 to Faughnan and O'Connell
22	Murphy/Faughnan/O'Connell email threads and FCPS letters – 06/22/2012 – 07/30/2012
23	OEC letter of 06/21/2012 (P. Exh. PP)
24	O'Connell/Marchant email threads regarding settlement of August 25, 24, 27, 2012
25	Marchant/O'Connell email thread of 08/28/2012 exchanging draft settlement agreement
26	O'Connell/Marchant email thread of 08/29/2012 with Settlement Agreement executed by Lee
27	Callahan/O'Connell email threads of 08/29/2012 – 10/14/2012
28	2014 Notice of Resignation and OEC response
29	Lee "Request for Settlement" of January 14, 2014
30	McCammon Group Invoice for Fact-Finding Panel

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